

Applicant: Sanchez, Eliezer
Serial No.: 10/625,862
February 11, 2005

REMARKS

In response to the Office Action dated August 11, 2004, reconsideration of this application is requested. Claim 1 has been amended without prejudice, Claims 11-14 have been added and Claims 1-14 remain pending. No new matter has been added.

Applicant respectfully traverses the Examiner's rejection of claims 1-10 under 35 USC Section 102, as being anticipated by Ladner et al. ("Ladner"). Notwithstanding the amendments to the claims, Applicant submits that the original claims do not read on Ladner and that Applicant's invention as claimed is structurally and fundamentally distinct therefrom. It is axiomatic in any proper Section 102 rejection that every element of the invention as claimed be contained in the cited reference. Applicant submits that Ladner fails to disclose every element of claims 1-10 and is structurally distinct from Applicant's claimed invention. Ladner discloses a mobile locator system for trucks. Ladner does not disclose a target locating device having a global positioning system and plurality of tracking devices as claimed by Applicant. Ladner also fails to disclose a means for concealing a target device, RF/IF converter, frequency synthesizer and reference oscillator as disclosed and claimed by Applicant. Notwithstanding, Claim 1 has been amended to place this application in condition for allowance.

For the reasons indicated above, Applicant asserts that claims 1-14 patentably distinguish Applicant's invention over the prior art of record, and are in condition for allowance. Applicant respectfully requests that the above rejections be reconsidered and withdrawn since the overall

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invention, as recited in Applicant's claims is neither taught nor suggested by the prior art.

Please charge any fees owing and not covered by the enclosed payment to the undersign's
deposit account No. 501708.

Should the Examiner have any concerns or comments, the undersigned would appreciate a
telephone conference in order to expedite this case.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'D. Lhota', written over a horizontal line.

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